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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**
11

12 _____)
13 SECURITIES AND EXCHANGE COMMISSION,)
14 Plaintiff,)
15 vs.)
16 THE CHILDREN'S INTERNET, NASSER V.)
HAMEDANI, SOLEH A. HAMEDANI,)
17 PETER A. PEREZ, CORT L. POYNER and)
TWO DOG NET, INC.)
18 Defendants,)
19 _____)

Case Number
C-06-6003-CW

**STIPULATION AND
ORDER TO CONTINUE
PRETRIAL
CONFERENCE AND
CERTAIN FILING DATES
IN LIGHT OF
POTENTIAL
SETTLEMENTS**

Date: March 31, 2008
Time: 8:30 am
Judge: Claudia Wilken
Courtroom: 2

1 **STIPULATION TO CONTINUE PRETRIAL CONFERENCE**

2 Pursuant to Local Rules 7-12 and 16-2(d), the undersigned parties to the above-entitled
3 action hereby stipulate to the entry of an Order continuing the pretrial conference – now set for March
4 11, 2008 – by one week to March 18, 2008, as well as the related deadlines for the meet-and-confer
5 session of counsel and the filing of the proposed joint pretrial order.

6 As the Court was advised during the December 13, 2007 case management conference,
7 the staff of the Securities and Exchange Commission (“Commission”) has received offers of settlement
8 from defendants The Children’s Internet (“TCI”), Two Dog Net, Nasser Hamedani, Sholeh Hamedani
9 and Peter Perez (“Perez”). The staff has just learned that the Commission’s members have scheduled
10 their consideration of those settlement proposals for the week of February 25, 2008. If those proposals
11 are accepted, it will leave Cort Poyner (“Poyner”) as the only remaining defendant and would reduce the
12 number of claims and issues to be tried. That will, in turn, significantly reduce the length of the trial.

13 At the current time, the pretrial conference is set for March 11, 2008, which means that
14 the meet and confer session of counsel must take place by February 21, 2008 and the pretrial statement
15 (with related papers) must be filed on February 29, 2008. The parties are concerned that under those
16 deadlines, they must rush to submit papers – such as jury instructions and witness lists – that will not
17 truly inform the Court of the issues to be tried following the settlements and that will no longer be
18 germane. The parties therefore request a one-week extension of the pretrial conference and all related
19 deadlines so that the parties may be able to draft and submit papers to the Court that account for the
20 impact of the settlements. The parties are not asking for any change in the trial date.

21 To facilitate the preparation of pretrial papers in light of potential settlements, the parties
22 therefore propose that:

- 23 1. The pretrial conference be continued from March 11, 2008 at 1:30 p.m. to March
24 18, 2008 at 1:30 p.m.
- 25 2. The final date for the meet and confer session of counsel be continued from
26 February 21, 2008 to February 28, 2008.
- 27 3. The final date for submitting the proposed joint pretrial conference statement and
28 all related papers be continued from February 29, 2008 to March 7, 2008.

1 DATED: February 19, 2008

2 Respectfully submitted,

3 John S. Yun

4 John S. Yun

Attorneys for the Plaintiff

SECURITIES AND EXCHANGE COMMISSION

6 Michael B. Cohen

7 Michael B. Cohen

Attorneys for Defendant

PETER A. PEREZ

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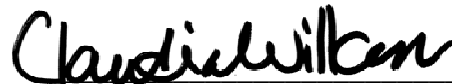
INTERNET, NASSER V. HAMEDANI, SHOLEH A.

HAMEDANI and TWO DOG NET, INC.

16 **ORDER CONTINUING PRETRIAL CONFERENCE**

17 BASED UPON THE PARTIES' STIPULATION, the Court hereby orders that (i) the
18 pretrial conference be continued from March 11, 2008 at 2:00 p.m. to March 18, 2008 at 2:00 p.m., (ii)
19 the final date for the meet and confer session of counsel be continued from February 21, 2008 to
20 February 28, 2008, and (iii) the final date for submitting the proposed joint pretrial conference statement
21 and all related papers be continued from February 29, 2008 to March 7, 2008. All other dates shall
22 remain the same pending further orders of the Court.

23 Dated: February 25, 2008

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25 Claudia Wilken, Judge

26 United States District Court